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September 24, 2014

Hon. Paul Gardephe, U.S.D.J., S.D.N.Y.
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:

The conference is adjourned to February 5, 2015 at 10:00 AM
Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: *Oct 3, 2014*

Re: United States v. Lederhaus-Okun, 13-cr-500

Your Honor,

I am the attorney representing the Third Party Petitioner, Robert Okun, in the pending forfeiture matter in the above-referenced matter.

By this letter, I am requesting, on behalf of the Government and counsel for Claimant Lloyd's, to adjourn the scheduled status conference for October 2d, 2014.

At this time, the parties are still engaged in both paper and deposition discovery. It is anticipated that this discovery will not be completed until at least mid-January 2015. This discovery is occurring concurrently with discovery in the state-court action brought by Claimant Lloyd's. Mr. Okun's ability to reach a resolution with the Government in this action is, in part, dependent upon his ability to reach some resolution with Lloyd's in the state court action. In order for the parties to be in a better position to reach such a global resolution, more discovery is needed. Therefore, we request a 90-day adjournment of the discovery schedule. No prior request for the aforementioned relief has been made.

In addition, thereto, with regard to next week's appearance before Your Honor, I leave on September 30th for London for depositions in another case, and will not be back until late Friday, October 3rd. Furthermore, the Court ought be apprised that I am commencing a trial before the Hon. Lewis Kaplan on November 3rd, that is anticipated to last until early January 2015.

Your consideration in this matter is greatly appreciated.

Respectfully submitted,

Bernard V. Kleinman
Bernard V. Kleinman

cc: A. Wilson, Esq., (OUSA/SDNY), via email
P. Rossi, Esq. (Clyde & Co.), via email

USDS SDNY
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